

Pamela J. Chaney
SBN 24006983
Monte J. White & Associates, P.C.
402 Cypress, Suite 310
Abilene, Texas 79601
(325)673-6699
(325)672-9227 Fax
Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION**

IN RE:	§	CASE NO. 13-10170-RLJ-13
	§	Chapter 13
Arnold Longoria Silva, Jr.	§	
Angelica Maria Silva	§	
Debtors	§	
	§	

DEBTORS' MOTION TO EXTEND THE AUTOMATIC STAY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Arnold Longoria Silva, Jr. and Angelica Maria Silva, (herein "Debtors"), and files their Motion to Extend the Automatic Stay and Request for Interim Relief, and, in support thereof, would show the court as follows:

1. Debtor(s) filed this Chapter 13 case on 7/8/2013, in the Northern District of Texas, Abilene Division.
2. Debtor(s) filed a prior Chapter 13 Bankruptcy case, Case No. 10-10284-RLJ-13, in the Northern District of Texas, Abilene Division on 8/26/2010 and said case was dismissed without prejudice on 7/3/2013 for failure to make timely payments to the Chapter 13 Trustee.
3. As a result of the Debtor(s) previous bankruptcy case, Case No. 10-10284-RLJ-13, pending within the one year period before Debtor'(s) current Chapter 13 Case was filed and pursuant to the provisions of 11 U.S.C. §362(c)(3)(A), the automatic stay will terminate on the 30th day after filing Debtor'(s) current Chapter 13 case
4. Debtor(s) will show this court the filing of the current Chapter 13 case is filed in good faith as to the creditors stayed.
5. Debtor(s)' prior Chapter 13 case was dismissed for arrears to the Chapter 13 Trustee.

6. Debtor(s) has agreed to enter into a wage withholding order and has submitted the required form to the Chapter 13 Trustee.

7. After a hearing on the motion, Debtor(s) request this Court enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. §1362(c)(1), 11 U.S.C. §361(c)(2), or a Motion for Relief is granted under 11 U.S.C. §362 (d) and for such further relief to which Debtor(s) may be justly entitled.

WHEREFORE, PREMISES CONSIDERED, Debtor(s) respectfully pray that after a hearing pray the Court enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. §1362(c)(1), 11 U.S.C. §362(d)(2) or a Motion for Relief is granted under 11 U.S.C. §362(d), and for such other relief at law and equity to which they may be entitled.

Respectfully Submitted,

Monte J. White & Associates, P.C.
402 Cypress, Suite 310
Abilene, Texas 79601
(325)673-6699
(325)672-9227 Fax

/s/Pamela J. Chaney
Pamela J. Chaney
SNB 24006983
Attorney for Debtors

CERTIFICATE OF CONFERENCE

On July 8, 2013, I spoke with Marc McBeath, attorney for the Chapter 13 Trustee, and he stated he was unopposed to this Motion.

/s/Pamela J. Chaney
Pamela J. Chaney
Attorney for Debtors

CERTIFICATE OF SERVICE

The undersigned certifies that on July 8, 2013 a true and correct copy of the foregoing document was transmitted to all parties in interest by ECF and/or regular mail.

Walter O'Cheskey
Standing Chapter 13 Trustee
6308 Iola
Lubbock, Texas 79424

U.S. Trustee
1100 Commerce Street
Room 976
Dallas, Texas 79242-1496

Attached mailing matrix

/s/Pamela J. Chaney
Pamela J. Chaney
Attorney for Debtors

Abilene Imaging Center LLC
P.O. Box 2937
Abilene, TX 79604-2937

Bac Home Loans Servi
450 American St
Simi Valley, CA 93065

Dish Network
Dept. 0063
Palantine, IL 60055-0063

Abilene Regional Medical Center
PO Box 849776
Dallas, TX 75284-9776

Beacon Ins
One Beacon Lane
Canton, MA 02021

First Premier Bank
601 S Minnesota Ave
Sioux Falls, SD 57104

Afni
Attention: Bankruptcy
1310 Martin Luther King Dr
Bloomington, IL 61701

Bristol West
P.O. Box 7412
Pasadena, CA 91109

Hamlin Memorial Hospital
PO Box 400
Hamlin,, TX 79520

Am Cred& Col
921 Oak St
Scranton, PA 18508

Cbe Group
131 Towe Park Dr Suite 1
Waterloo, IA 50702

Hamlin National Bank
231 S Central Ave
Hamlin, TX 79520

Americredit
Po Box 181145
Arlington, TX 76096

Collection
700 Longwater Dr
Norwell, MA 02061

IBC Bank
130 East Travis
San Antonio, TX 78205

Angelica Maria Silva
1029 N.W. 3rd St.
Hamlin, TX 79520

Collection
CCS
PO Box 709
Needham, MA 02494

Internal Revenue Service
1100 Commerce
MC 5029 DAL
Dallas, TX 75242

Arnold Longoria Silva, Jr.
1029 N.W. 3rd St.
Hamlin, TX 79520

Collection Professiona
29 N Connor St
Sheridan, WY 82801

Internal Revenue Service
PO Box 21126
Philadelphia, PA 19114

Aspermont I.S.D.
P.O. Box 308
Aspermont, TX 79502

Crd Prt Asso
Attn: Bankruptcy
PO Box 802068
Dallas, TX 75380

Jefferson Capital Syst
16 Mcleland Rd
Saint Cloud, MN 56303

Asset Recovery Department
P.O. Box 829
Springdale, AZ 72764

Credit One Bank
Po Box 98875
Las Vegas, NV 89193

Jerry Sheiver
Perdue Brandon Fielder Collins
6300 La Calma Drive, Suite 450
Austin, TX 78752

AT&T
Cardmember Service
PO Box 44167
Jacksonville, FL 32231-4167

Credit Systems Intl In
1277 Country Club Ln
Fort Worth, TX 76112

Jones County Appraisal District
Attn: Susan Holloway
PO Box 348
Anson, TX 79501

Lamont Hanley & Associ
1138 Elm St
Manchester, NH 03101

Radiology Associates of Abilene
PO Box 2898
Abilene, TX 79604

Zenith Acquisition
220 John Glenn Dr # 1
Amherst, NY 14228

M&C Lumber & Hardware
P.O. Box 548
Hamlin, TX 79520

Security Fin
Attn: Bankruptcy
PO Box 1893
Spartanburg, SC 29304

Mer&pro Cr B
Po Box 140675
Austin, TX 78714

Sheridan Memorial Hospital
1401 West 5th St.
Sheridan, WY 82801

Mil Star
Attention: Bankruptcy
PO Box 6250
Madison, WI 53716

SuddenLink
P.O. Box 78670
Phoenix, AZ 85062-8670

Monte J. White & Associates, P.
402 Cypress, Suite 310
Abilene, TX 79601

Talbott Coll
1603 Babcock
San Antonio, TX 78229

National Credit Adjusters
PO Box 3023
Hutchinson, KS 67504-0550

Tam/spearsdh
4115 Medical Drive
San Antonio, TX 78229

Natl Recover
4201 Crums Mill Rd
Harrisburg, PA 17112

Texas Guar Student Loa
Po Box 83100
Round Rock, TX 78683

Penn Foster
P.O. Box 1900
Scranton, PA 18501

West Central Tx Coll B
Po Box 2586
Abilene, TX 79604

Perdue, Brandon Fielder, Collin
PO Box 13430
Arlington, TX 76094-0430

West Central Tx Coll B
1007 W Illinois Ave
Midland, TX 79701

Portfolio Rc
Attn: Bankruptcy
PO Box 41067
Norfolk, VA 23541

WTU Retail Energy
P.O. Box 21588
Tulsa, OK 74121-1588